

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1

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*Counsel to the Debtors
and Debtors-in-Possession*

In re:

NEW ENGLAND MOTOR FREIGHT, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-12809 (JKS)
(Jointly Administered)

Hearing Date: June 4, 2019 @ 10:00 a.m.

Judge: Hon. John K. Sherwood

ADJOURNMENT REQUEST

1. I, KAREN A. GIANNELLI, ESQ.,

☒ am the attorney for: New England Motor Freight, Inc. *et al.*, Debtors and Debtors in Possession,

☐ am self represented,

and request an adjournment of the following hearing for the reason set forth below.

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

Matter: Debtors' Motion For Interim and Final Orders (I) Authorizing Use of JPMorgan Chase Bank, N.A.'s Cash Collateral Pursuant to 11 U.S.C. § 363 (II) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001, and (IV) Granting Related Relief [Dkt. No. 19]; Debtors' Motion For Interim and Final Orders (I) Authorizing Use of TD Bank, N.A.'s Cash Collateral Pursuant to 11 U.S.C. § 363 (II) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363, (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001, and (IV) Granting Related Relief [Dkt. No. 20]; with related Orders [Dkt Nos. 101 and 202] and Declaration [Dkt. No. 162]

Current hearing date and time: June 4, 2019 @ 10:00 a.m.

New date requested: June 11, 2019 @ 10:00 a.m.

Reason for adjournment request: Debtors have advised their cash collateral lenders that they will not be moving forward with a cash collateral hearing on June 4, as scheduled, but propose that such hearing be continued to June 11 (subject to the Court's availability). In the interim, the Debtors will not be using the banks' cash collateral, subject to a reservation of rights to return to Court in the event something unforeseen occurs.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: May 31, 2019

/s/ Karen A. Giannelli
Karen A. Giannelli, Esq.

COURT USE ONLY:

The request for adjournment is:

☒ Granted New hearing date: 6/11/2019 @ 10:00 ☐ Peremptory

☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory

☐ Denied